

## **EXHIBIT 2**

**Moerke, Katie**

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**From:** Hunter, Eileen M. <Eileen.Hunter@FaegreBD.com>  
**Sent:** Friday, June 26, 2015 3:26 PM  
**To:** Conneely, Kevin; Moerke, Katie  
**Cc:** Harold Barza; Matt Hosen; Bepko, Arminda B.; Friedman, Lawrence B.; Brannon, Leah  
**Subject:** RE: Moldex Metric, Inc. v. 3M Company - motion to amend

Kevin,

We've looked at Moldex's proposed amendments and considered the applicable standard and do not believe that Moldex has met it.

I'm available to call the Court through 4:15 today.

Regards,

Eileen

Eileen M. Hunter

*Partner*

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**Faegre Baker Daniels LLP**

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**From:** Conneely, Kevin [mailto:[kevin.conneely@stinsonleonard.com](mailto:kevin.conneely@stinsonleonard.com)]  
**Sent:** Friday, June 26, 2015 2:28 PM  
**To:** Hunter, Eileen M.; Moerke, Katie  
**Cc:** Harold Barza; Matt Hosen; Bepko, Arminda B.; Friedman, Lawrence B.; Brannon, Leah  
**Subject:** RE: Moldex Metric, Inc. v. 3M Company - motion to amend

Ms. Hunter,

Katie Moerke is out of the office today, but I am prepared to call the court with you. Are you free this afternoon?

Also, We want to fully comply with our Rule 7.1 "meet and confer" obligations. having sent you the proposed amendment to the Complaint can you please tell us on which grounds (timing, prejudice, futility, etc.) 3M objects to this motion to amend? Doing so will help us to focus our briefing to the court.

KDC

**Kevin D. Conneely | Partner | Stinson Leonard Street LLP**  
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**From:** Hunter, Eileen M. [mailto:[Eileen.Hunter@FaegreBD.com](mailto:Eileen.Hunter@FaegreBD.com)]  
**Sent:** Friday, June 26, 2015 2:03 PM

**To:** Moerke, Katie  
**Cc:** Harold Barza; Conneely, Kevin; Matt Hosen; Bepko, Arminda B.; Friedman, Lawrence B.; Brannon, Leah  
**Subject:** RE: Moldex Metric, Inc. v. 3M Company - motion to amend

Katie,

Thanks for the email below. 3M is not willing to consent to the amendment.

Please include me on any call you make to the Court to schedule a hearing.

Regards,

Eileen

Eileen M. Hunter

*Partner*

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**From:** Moerke, Katie [<mailto:katie.moerke@stinsonleonard.com>]

**Sent:** Thursday, June 25, 2015 9:35 AM

**To:** Friedman, Lawrence B.; Brannon, Leah; Bepko, Arminda B.; Hunter, Eileen M.

**Cc:** Harold Barza; Conneely, Kevin; Matt Hosen

**Subject:** RE: Moldex Metric, Inc. v. 3M Company - motion to amend

Larry,

Attached is Moldex's proposed amended complaint, which adds a claim for punitive damages with respect to Moldex's malicious prosecution claim.

Katie

**Katherine A. Moerke** | Partner | Stinson Leonard Street LLP

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**From:** Friedman, Lawrence B. [<mailto:lfriedman@cgsh.com>]

**Sent:** Wednesday, June 24, 2015 4:44 PM

**To:** Moerke, Katie; Brannon, Leah; Bepko, Arminda B.; [eileen.hunter@faegrebd.com](mailto:eileen.hunter@faegrebd.com)

**Cc:** Harold Barza; Conneely, Kevin; Matt Hosen

**Subject:** RE: Moldex Metric, Inc. v. 3M Company - motion to amend

Katie, can you please send the proposed amendment to us for our review? We will then respond to your request that we consent to the proposal as promptly as we can do so.

Thanks.

Larry

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**From:** Moerke, Katie [<mailto:katie.moerke@stinsonleonard.com>]  
**Sent:** Tuesday, June 23, 2015 7:07 PM  
**To:** Friedman, Lawrence B.; Brannon, Leah; Bepko, Arminda B.; [eileen.hunter@faegrebd.com](mailto:eileen.hunter@faegrebd.com)  
**Cc:** Harold Barza; Conneely, Kevin; Matt Hosen  
**Subject:** Moldex Metric, Inc. v. 3M Company - motion to amend

Counsel,

The Court's Scheduling Order sets a July 1, 2015, deadline for motions to amend. Doc. No. 70 at 1. Moldex seeks to amend its Complaint to add a claim for punitive damages under Moldex's malicious prosecution claim (i.e., Second Claim for Relief).

Will 3M consent to such an amendment? If not, please let us know when 3M would be available to meet and confer on Wednesday or Thursday of this week.

Thank you,  
Katie

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